UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF INDIANA INDIANAPOLIS DIVISION

JOHN DOE,

Plaintiff,

v. Case No: 1:23-cv-00643-SEB-MG

INDIANA UNIVERSITY BLOOMINGTON, INDIANA UNIVERSITY BOARD OF TRUSTEES, KATHY ADAMS RIESTER, in her individual and official capacity, and LATOSHA WILLIAMS, in her individual and official capacity,

Defendants.

JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER

Plaintiff John Doe and Defendants Indiana University Bloomington, Indiana University Board of Trustees, Kathy Adams Riester, and Latosha Williams, by counsel, have conferred and agreed to a Stipulated Uniform Protective Order pursuant to Rule 26(c) of the Federal Rules of Civil Procedure so that confidential information will be disclosed only in designated ways. A copy of the proposed order is submitted as an exhibit to this Motion for this Court's review, approval, and entry.

WHEREFORE, Plaintiff John Doe and Defendants Indiana University Bloomington, Indiana University Board of Trustees, Kathy Adams Riester, and Latosha Williams, by counsel, jointly request that the Court enter the Proposed Stipulated Uniform Protective Order governing the designation, use, and disclosure of confidential information in this litigation.

Respectfully submitted,

Tara J. Davis

Tara J. Davis NESENOFF & MILTENBERG, LLP 101 Federal Street, 19th Floor Boston, MA 02110

Andrew T. Miltenberg NESENOFF & MILTENBERG, LLP 363 Seventh Avenue, Fifth Floor New York, NY 10001

Michael T. McNally DELK MCNALLY LLP 610 Rangeline Rd. Carmel, IN 46033

Attorneys for Plaintiff

Respectfully submitted,

Liberty L. Roberts

Liberty L. Roberts Cassie N. Heeke

CHURCH CHURCH HITTLE + ANTRIM

Two North Ninth Street Noblesville, IN 46060

Amy Fox CHURCH CHURCH HITTLE + ANTRIM 203 W. Wayne Street, Suite 402 Fort Wayne, IN 46802

Attorneys for Defendants